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**Morgan, Lewis
& Bockius LLP**
C O U N S E L O R S A T L A W

Howard T. Weir
202-467-7195

November 12, 1996

VIA FACSIMILE

Muthu Sundram, Esq.
New Jersey Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
Region II
290 Broadway
New York, New York 10007-1866

**Re: Response of Federal Pacific Electric Company to Request For Information
 Concerning Cornell-Dubilier Site, Hamilton Industrial Park, 333 Hamilton
 Boulevard, South Plainfield, New Jersey**

Dear Mr. Sundram:

I am writing on behalf of Federal Pacific Electric Company ("FPE") in response to a letter from Mr. Richard L. Caspe of the United States Environmental Protection Agency seeking information regarding property located at 333 Hamilton Boulevard, South Plainfield, New Jersey (the "Site"). I am submitting this response pursuant to the extension of time to and including November 12, 1996 that you were kind enough to grant to me. This extension was necessitated in part because of the time that has passed since the events upon which you are seeking information and the fact that FPE is no longer an operating company with employees available to assist it in responding to EPA's inquiry. Given these dual constraints, the response is based upon information currently available to FPE.

**GENERAL OBJECTIONS TO THE REQUEST FOR INFORMATION AND THE
INSTRUCTIONS AND DEFINITIONS THERETO**

FPE objects to the individual requests in the Request for Information ("Request") and the Instructions and Definitions accompanying that Request on the grounds that the requests singly

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and in combination with the Instructions and Definitions are vague and ambiguous, confusing and over broad; impose an undue burden and expense upon FPE disproportionate to the value of the information called for; call for information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; and the instructions do not ask questions but seek to impose obligations.

FPE also objects to the definition of "Company" as including its subsidiaries. FPE further objects to the requests to the extent that they seek information protected from disclosure by the attorney-client privilege, joint defense privilege, work product doctrine and/or any other applicable privilege. By responding to the requests FPE does not waive any privilege. FPE also objects to the requests to the extent that they seek confidential business and financial information or other information proprietary to FPE or other legal entities, and to the extent the request seeks documents or information in the possession of EPA.

FPE further objects to these requests to the extent that they exceed the authority created by or are otherwise inconsistent with other federal laws and regulations. FPE did not own or operate the Site; much less generate, store, treat, dispose of hazardous substances, hazardous wastes, or hazardous materials at the Site; nor did FPE transport such substances to the Site. Nonetheless, in a spirit of cooperation, and without waiver of its rights now or hereafter to object to furnishing the requested information, FPE will respond to the requests.

FPE will answer the individual requests in accordance with the ordinary and accepted usage of the English language.

Subject to the foregoing objections, which are incorporated in FPE's responses to the individual questions as if fully set forth therein, and without waiver thereof, FPE responds to the numbered questions set forth below.

INTRODUCTION

As a preliminary matter FPE sets forth a brief corporate history which it believes may assist the EPA in understanding the corporate relationship of the entities about whom the EPA is requesting information. This introduction is incorporated by reference in FPE's responses below.

FPE was incorporated in Delaware in 1954 and resulted from a merger in 1954 between Pacific Electric Manufacturing Company and Federal Electric Products Company. FPE has been a non-operating company since late 1986 but prior to that time was engaged primarily in the business of manufacturing devices for the distribution and control of electrical energy.

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CDE was incorporated in Delaware in 1936 and since that time has been engaged in the manufacture of capacitors and electric components for the electronics industry.

Prior to 1959, FPE owned none of the stock of CDE. In 1959 FPE owned approximately 4% of CDE's common stock. In February of 1960, FPE acquired the majority of CDE's common stock by exchanging certain of its stock for CDE's common stock. FPE sold its CDE common stock holdings in 1983.

Reliance Electric Company ("REC") acquired FPE's common stock in 1979. FPE understands that by this date CDE had long since ceased to have any connection with the Site.

FPE'S ANSWERS TO INFORMATION REQUEST CORNELL-DUBILIER SITE

RESPONSE TO REQUEST NO. 1

- (a) Federal Pacific Electric Company
25700 Science Park Drive
Beachwood, Ohio 44122
- (b) President -- Karl Hein
Assistant Secretary -- Howard Abramoff
- (c) FPE was incorporated in Delaware in 1954.

CT Corporation Services
820 Bear Tavern Road
West Trenton, New Jersey 08628
- (d) Reliance Electric Company. See Introduction above.

RESPONSE TO REQUEST NO. 2

FPE never conducted operations at the Site.

RESPONSE TO REQUEST NO. 3

Not applicable.

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RESPONSE TO QUESTION NO. 4

Not applicable.

RESPONSE TO REQUEST NO. 5

Not applicable.

RESPONSE TO REQUEST NO. 6

Not applicable.

RESPONSE TO REQUEST NO. 7

Not applicable.

RESPONSE TO REQUEST NO. 8

No.

RESPONSE TO REQUEST NO. 9

Not in connection with the Site.

RESPONSE TO REQUEST NO. 10

Not applicable.

RESPONSE TO REQUEST NO. 11

FPE has no information regarding the subject matter of this request.

RESPONSE TO REQUEST NO. 12

Thomas J. Brosnahan
3550 Golf Avenue
Little River, South Carolina 29566

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RESPONSE TO REQUEST NO. 13

FPE has no information regarding the subject matter of this request.

RESPONSE TO REQUEST NO. 14

FPE has no information regarding the subject matter of this request.

RESPONSE TO REQUEST NO. 15

No.

RESPONSE TO REQUEST NO. 16

Not applicable.

RESPONSE TO REQUEST NO. 17

No.

RESPONSE TO REQUEST NO. 18

No.

RESPONSE TO REQUEST NO. 19

Not applicable.

RESPONSE TO REQUEST NO. 20

No.

RESPONSE TO REQUEST NO. 21

Not applicable.

RESPONSE TO REQUEST NO. 22

FPE has no information regarding the subject matter of this request.

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RESPONSE TO REQUEST NO. 23

Not applicable.

RESPONSE TO REQUEST NO. 24

FPE has no information regarding the subject matter of this request.

RESPONSE TO REQUEST NO. 25

FPE acquired most of CDE's common stock on or about February, 1960 in an exchange of stock transaction. CDE owned the Site at the time.

RESPONSE TO REQUEST NO. 26

In September, 1983, pursuant to a stock purchase agreement dated June 22, 1983, FPE sold its stock holdings to a CDE management group headed by James Kaplan called Kaplan Electronics ("KE"). KE purchased 379,000 shares for \$8.1 million and caused CDE to redeem 135,000 shares for \$2.9 million. The United States has been in possession of this information for many years and it would be burdensome and oppressive to require FPE to provide this information. Please contact Dan Beckhard of the United States Department of Justice at the following address for details of this transaction and related documents:

Daniel C. Beckhard, Esq.
Environmental Enforcement Section
Environment and Natural Resources Division
United States Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044

RESPONSE TO REQUEST NO. 27

No.

RESPONSE TO REQUEST NO. 28

See response to Question No. 26.

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RESPONSE TO REQUEST NO. 29

Not applicable.

RESPONSE TO REQUEST NO. 30

No.

RESPONSE TO REQUEST NO. 31

FPE has no information regarding the subject matter of this request.

RESPONSE TO REQUEST NO. 32

- a. Not applicable.
- b. FPE objects to this request as burdensome and oppressive. Please see Mr. Beckhard for this information.
- c. Not applicable.
- d. Not applicable.
- e. Not applicable.
- f. Not applicable.
- g. Not applicable.

RESPONSE TO REQUEST NO. 33

Not applicable.

RESPONSE TO REQUEST NO. 34

Not applicable.

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RESPONSE TO REQUEST NO. 35

Not applicable.

RESPONSE TO REQUEST NO. 36

Not applicable.

RESPONSE TO REQUEST NO. 37

CDE owned this Site in the 1950's and early 1960's. It is believed that CDE used the Site for manufacturing operations. It is believed that in May, 1961, CDE entered into a contract to sell the Site to V.J. Corace.

RESPONSE TO REQUEST NO. 38

FPE objects to Request No. 38 on the grounds that it seeks information protected by the attorney-client privilege and/or work product doctrine.

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CORNELL-DUBILIER ELECTRONICS SITE
CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of Ohio
County of Cuyahoga:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the Company's response thereto should become known or available to the Company.

Howard B Abramoff
NAME (print or type)

Asst. Secretary
TITLE (print or type)

Howard B Abramoff
SIGNATURE

Sworn to before me this

12th day of Nov., 1996

Cathy Ann Rivera
Notary Public

CATHY ANN RIVERA
NOTARY PUBLIC, STATE OF OHIO
Recorded in Cuyahoga County
My Comm. Expires Dec. 17, 1998